

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (FM) ECF Case
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*This document relates to:*

*Federal Insurance Co., et al. v. Al Qaida, et al., Case No. 03 Civ. 6978*

**DECLARATION OF J. SCOTT TARBUTTON**

I, J. Scott Tarbutton, Esq., declare under penalty of perjury, as provided for by 28 U.S.C. § 1746, that the following statements are true and correct:

1. I am a member of the law firm Cozen O'Connor, counsel for the *Federal Insurance* plaintiffs in this matter. I submit this Declaration in support of the Memorandum of Law in Support of Plaintiffs' Application for Attorneys' Fees and Expenses Pursuant to Opinion and Order of February 15, 2017.

2. Following this Court's February 15, 2017 Opinion and Order awarding plaintiffs' reasonable attorneys' fees and costs as a result of defendant Perouz Sedaghaty's non-compliance with the Court's discovery orders (ECF No. 3447), I was responsible for overseeing the collection of all relevant attorney time entries from the time keeping and billing system used by Cozen O'Connor, Intapp Time ("Intapp").

3. For purposes of the Memorandum of Law in Support of Plaintiffs' Application for Attorneys' Fees and Expenses Pursuant to Opinion and Order of February 15, 2017, applicable time entries for the Cozen O'Connor attorneys were identified by searching the Intapp system for

the time periods relevant to the discovery dispute with defendant Perouz Sedaghaty using specific search terms.

4. Cozen O'Connor used a variety of search terms to locate the pertinent time entries, including but not limited to the following: "Perouz Sedaghaty," "Pete Sedaghaty," "Pete Seda," "Perouz," "Sedaghaty," "Seda Ghaty," and "Seda."

5. As a result of those efforts, the firm retrieved numerous time entries for Cozen O'Connor attorneys directly relevant to the discovery dispute with defendant Perouz Sedaghaty, which are listed in plaintiffs' fee application.

6. Although Cozen O'Connor undertook its best efforts to identify and retrieve all time entries relating to the dispute, it is reasonable to believe that other relevant entries were not captured because they fell outside the scope of the above searches. Thus, it is likely that certain relevant time entries relating to work performed in relation to the dispute with defendant Perouz Sedaghaty were omitted from the fee application, even though compensable under the Court's order.

7. In addition, expenses relating to the discovery dispute with defendant Perouz Sedaghaty were retrieved by the firm's accounting department at my direction. True and correct copies of all receipts in support of Cozen O'Connor's request for reimbursement of expenses have been provided to the Court.

8. I certify that all of the foregoing statements made by me are true, and I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Executed on March 28, 2017.



J. Scott Tarbutton, Esq.